

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

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THOMAS H. COULD  
CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE

Alphonso R. Hughes

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. 14-2910

Riviana Foods  
Teamster Local 984

(Name of defendant or defendants)

**COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964**

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, Alphonso R. Hughes  
(name of plaintiff)

is a citizen of the United States and resides at 6344 Braybourne Main  
(street address)

Olivebranch  
(city)

United State  
(country)

Mississippi  
(state)

38654  
(zip code)

901-461-5251  
(telephone number)

3. Defendant Riviana Foods and Teamster's Local 984  
(defendant's name)

lives at, or its business is located at (Riviana) 2314 Lauderdale St. Memphis TN  
(street address)

38106 (Teamster local 984) 3020 Sandbrook St Memphis TN  
38116

4. Plaintiff sought employment from the defendant or was employed by the defendant at

2314 Lauderdale St

Memphis United States TN 38106  
(city) (country) (state) (zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about 9/11/12, 12/26/12, 1/13/14

(day) (month) (year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about

(day) (month) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about

(day) (month) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 29<sup>th</sup> August 2014. (Attach a copy of the notice to this complaint.)  
(day) (month) (year)

9. Because of plaintiff's (1) X race, (2) X color, (3) X sex, (4)    religion, (5)    national origin, defendant

(a)    failed to employ plaintiff.

(b)    terminated plaintiff's employment.

(c) X failed to promote plaintiff.

(d) Equal pay Act, Constructive discharge, retaliation, harassment, Disability discrimination, age discrimination

10. The circumstances under which defendant discriminated against plaintiff were as follows: See attachment paperwork

11. The acts set forth in paragraph 9 of this complaint

- (a) ☐ are still being committed by defendant.
- (b) ☒ are no longer being committed by defendant.
- (c) ☐ may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) ☐ Defendant be directed to employ plaintiff, or
- (b) ☐ Defendant be directed to re-employ plaintiff, or
- (c) ☐ Defendant be directed to promote plaintiff, or;
- (d) ☒ Defendant be directed to Pay Punitive and Compensatory damages of \$1,800,000.00

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes ☒ No ☐

Alphonso R. Hughes  
SIGNATURE OF PLAINTIFF